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-and-

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UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

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Attorneys for Baion Group, LLC

| | X | |
|---------------------------------------|----------|-------------------------|
| |) | |
| In re: |) | Chapter 11 |
| |) | |
| AUTOMOTORES GILDEMEISTER, SpA, et al. | $,^{1})$ | Case No. 21-10685 (LGB) |

Debtors.

MOTION FOR ADMISSION TO PRACTICE PRO HAC VICE

Joint Administration Requested

¹ The Debtors, together with each of the Debtor's Chilean, Brazilian, and/or Uruguayan tax identification number, as applicable, are: Automotores Gildemeister SpA (79.649.140-K), AG Créditos SpA (76.547.689-5), Marc Leasing, S.A. (96.658.270-7), Fonedar S.A. (216288040014), Camur S.A. (216589740015), Lodinem S.A. (217115010014), Carmeister S.A. (96.630.690-7), Maquinaria Nacional S.A. (Chile) (96.812.980-5), RTC S.A. (89.414.100-K), Fortaleza S.A. (76.856.380-2), Maquinarias Gildemeister S.A. (78.862.000-8), Comercial Gildemeister S.A. (76.856.310-1), and Bramont Montadora Industrial e Comercial de Vehiculos S.A. (04.926.142/0002-16). The location of the corporate headquarters and the service address for Automotores Gildemeister SpA is: 11000 Avenida Las Condes Vitacura, Santiago, Chile.

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I, William S. Sugden, request admission, *pro hac vice*, before the Honorable Lisa G. Beckerman, to represent Baion Group, LLC in the above-referenced case.

I certify that I am a member in good-standing of the bar in the State of Georgia, and the bar of the U.S. District Court for the Northern and Middle Districts of Georgia.

I have submitted the filing fee of \$200.00 with this motion for *pro hac vice* admission.

Dated: April 13, 2021 Atlanta, Georgia

Respectfully submitted,

/s/ William S. Sugden

William S. Sugden

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|---------------------------|---|
| In re: |) Chapter 11 |
| AUTOMOTORES GILDEMEISTER, | SpA, et al., ¹) Case No. 21-10685 (LGB) |
| |) Joint Administration Requested |
| Debtors. |) |

Upon the motion of William S. Sugden, to be admitted, pro hac vice, to represent Baion Group, LLC (the "Client") in the above-referenced case, and upon the movant's certification that the movant is a member in good standing of the bar in the State of Georgia, and the bar of the U.S. District Court for the Northern and Middle Districts of Georgia., it is hereby:

ORDERED, that William S. Sugden is admitted to practice, pro hac vice, in the above-referenced case to represent the Client, in the United States Bankruptcy Court for the Southern District of New York, provided that the filing fee has been paid.

Dated: April _____, 2021 New York, New York

UNITED STATES BANKRUPTCY JUDGE

¹ The Debtors, together with each of the Debtor's Chilean, Brazilian, and/or Uruguayan tax identification number, as applicable, are: Automotores Gildemeister SpA (79.649.140-K), AG Créditos SpA (76.547.689-5), Marc Leasing, S.A. (96.658.270-7), Fonedar S.A. (216288040014), Camur S.A. (216589740015), Lodinem S.A. (217115010014), Carmeister S.A. (96.630.690-7), Maquinaria Nacional S.A. (Chile) (96.812.980-5), RTC S.A. (89.414.100-K), Fortaleza S.A. (76.856.380-2), Maguinarias Gildemeister S.A. (78.862.000-8), Comercial Gildemeister S.A. (76.856.310-1), and Bramont Montadora Industrial e Comercial de Vehiculos S.A. (04.926.142/0002-16). The location of the corporate headquarters and the service address for Automotores Gildemeister SpA is: 11000 Avenida Las Condes Vitacura, Santiago, Chile.